



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

KELLY JONES and JASON JONES, )  
)  
Plaintiffs, )  
)  
v. )  
)  
UNITED STATES OF AMERICA, )  
METROPOLITAN NASHVILLE )  
AIRPORT AUTHORITY and )  
WILLIAM GREEN, )  
)  
Defendants. )

CASE NO.: 3:23-cv-00184  
JUDGE TRAUGER  
MAGISTRATE JUDGE HOLMES

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER,  
OR OTHERWISE RESPOND TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

The Defendant, United States of America, by and through the United States Attorney and the undersigned Assistant United States Attorney, respectfully moves for an extension of time by and through January 26, 2024, within which to file its answer or other responsive pleading to the Plaintiff's Second Amended Complaint (ECF No. 47). For cause, the Defendant states as follows:

Per one reading of Fed. R. Civ. P. 15, the federal defendant's answer or other responsive pleading is due on December 26, 2023, fourteen days from service of the Plaintiffs' amended pleading.<sup>1</sup> Regardless, with the potentially short deadline under Rule 15(a)(3) falling amidst the holidays, the production of a responsive pleading will be difficult. The undersigned respectfully submits that it will require additional time to adequately respond to the allegations of the Second

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<sup>1</sup> Indeed, there is some tension between Rule 12(a)(2), which permits the United States 60 days to serve a responsive pleading, and Rule 15(a)(3), which requires a response to be served within the longer of 14 days or the time remaining to respond to an original pleading. It is not clear whether an amended complaint adding the government as a party qualifies as an original pleading for the purposes of the government's response timeline or if it.